

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re

**LAWRENCE EDWARD FUSARO
MICHELE JOANN MARMERO**

Debtor(s)

**: CHAPTER 13
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: No. 15-17318 amc**

DEBTORS' OBJECTION TO CERTIFICATION OF DEFAULT FILED BY PNC BANK, NATIONAL ASSOCIATION

COMES NOW, Lawrence Edward Fusaro and Michele Joann Marmero, Debtors and Respondents, by and through attorney of record, Michele Perez Capilato, Esquire, and submit the following Objection to the Certification of Default filed by PNC Bank, National Association, filed herein and state:

1. Debtors acknowledge they fell behind with post-petition payments due to Debtor Spouse' health problems. However, on June 10, 2019, Movant approved Debtors for a trial loan modification.
2. Debtors have already made their first trial payment for July 1, 2019. The next payment is not due until August 1, 2019.
3. Debtors are searching for proof of payment and will immediately provide same to Counsel.

Wherefore Debtors respectfully request that this honorable Court refrain from signing the Order Modifying the Automatic Stay, and set a hearing date giving the Debtors an opportunity to provide proof of compliance with the Stipulation, and that Debtors have judgment for reasonable costs and attorneys fees incurred in connection with the defense of this matter.

July 19, 2019

LAW OFFICES OF MICHELE PEREZ CAPILATO

BY: /s/ Michele Perez Capilato
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